

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Joseph George
Debtor

SN Servicing Corporation as
servicer for U.S. Bank Trust
National Association, as Trustee of
Ranch Series III Trust
Movant
v.

Joseph George
Henry J George- Co-Debtor
Kenneth E. West Trustee
Respondents

Case No.: 17-14689-amc

Chapter: 13

Judge: Ashely M. Chan

Hearing Date: November 15, 2022 at 11:00 A.M.

Objection Deadline: November 8, 2022

**NOTICE OF MOTION FOR RELIEF FROM
AUTOMATIC STAY AND CO-DEBTOR STAY**

SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Ranch Series III Trust has filed a Motion for Relief from Stay and Co-Debtor Stay with the Court in order to gain Court authority to foreclose on real property known as 4201 Decatur Street, Philadelphia, PA 19149.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before November 8, 2022 (14 days after the date the notice was mailed) you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk of Court
United States Bankruptcy Court
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lauren M. Moyer, Esquire
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on the 15th day of November, 2022, at 11:00 A.M., at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: October 25, 2022

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
Bankruptcy@FriedmanVartolo.com

TO:

Trustee

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Debtor's Counsel

ROBERT NEIL BRAVERMAN
McDowell Law, PC
46 West Main Street
Maple Shade, NJ 08052

Debtor's Counsel

ROBERT LEITE-YOUNG
Law Office Robert Leite-Young
6950 Castor Avenue
Philadelphia, PA 19149

U.S. Trustee

United States Trustee
Office of the U.S. Trustee
Robert N.C. Nix Federal Building
Suite 300
Philadelphia, PA 19107

Debtor

Joseph George
508 Solly Drive
Philadelphia, PA 19136

Co-Debtor

Henry J George
4201 Decatur Street
Philadelphia, PA 19149